

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**PLAINTIFF'S ASSENTED-TO MOTION TO FILE UNDER SEAL
PORTIONS OF SFFA'S OPPOSITION TO HARVARD'S MOTION TO SEAL
CERTAIN INFORMATION FILED IN CONNECTION WITH
THE PARTIES' SUMMARY JUDGMENT MOTIONS**

Pursuant to Local Rule 7.2 and this matter's Stipulated Protective Order (Dkt. No. 55), and this Court's recent order adopting the parties' proposed briefing schedule for resolving disputes relating to confidentiality (Dkt. 409), Plaintiff, Students for Fair Admissions, Inc. ("SFFA"), hereby moves this Court for an order sealing portions of its Opposition to Harvard's Motion to Seal Certain Information Filed in Connection with the Parties' Summary Judgment Motions (the "Opposition"). This upcoming filing will contain substantial information that makes reference to Exhibits B and C to Defendant's Memorandum in Support of its Motion for Summary Judgment ("Defendant's Memorandum"), which have been designated by Defendant as Confidential and/or Highly Confidential – Attorneys' Eyes Only pursuant to the Stipulated Protective Order. To comply with Defendant's designations, SFFA requests an order that allows the portions of its Opposition that reference Exhibits B and C to Defendant's Memorandum to be filed under seal. Pursuant to Local Rule 7.1(a)(2), Defendant was made aware of this motion and assents to it.

WHEREFORE, SFFA respectfully requests that the Court grant this motion and allow the portions of its Opposition that reference Exhibits B and C to Defendant's Memorandum to be filed under seal until further order of the Court such that it may be viewed only by the Judge, her clerk(s), and Court personnel in connection with SFFA's Motion for Summary Judgment.

Respectfully submitted,

By: /s/ Patrick Strawbridge

Paul M. Sanford BBO #566318
BURNS & LEVINSON LLP
One Citizens Plaza, Suite 1100
Providence, RI 02903
Tel: 617-345-3000
Fax: 617-345-3299
psanford@burnslev.com

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William S. Consovoy
Thomas R. McCarthy
Michael H. Park
J. Michael Connolly
CONSOVOY MCCARTHY PARK PLLC
3033 Wilson Boulevard, Suite 700
Arlington, Virginia 22201
Tel: 703-243-4923
Fax: 703.243.4923
will@consovoymccarthy.com
tom@consovoymccarthy.com
park@consovoymccarthy.com
mike@consovoymccarthy.com

Patrick Strawbridge BBO #678274
CONSOVOY MCCARTHY PARK PLLC
Ten Post Office Square
8th Floor South PMB #706
Boston, MA 02109
Tel: 617-227-0548
patrick@consovoymccarthy.com

*Counsel for Plaintiff Students for Fair
Admissions, Inc.*

CERTIFICATE OF CONFERENCE

In accordance with Local Rules 7.1(a), I hereby certify that Defendant's counsel was made aware of this motion before it was filed and assents to the relief requested therein.

/s/ Patrick Strawbridge

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

/s/ Patrick Strawbridge